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March 4, 2024

BY ECF

The Honorable J. Paul Oetken
United States District Court Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. John Costanzo Jr. and Manuel Recio*, 22 Cr. 281 (JPO)

Dear Judge Oetken:

This letter is respectfully submitted on behalf of defendant Manuel Recio to request leave of Court to submit a reply to the government's Opposition to Defendants' Post-Trial Motions, D.E. 220, by no later than April 2, 2024. The extended deadline is necessary because judicial resources will be saved by Mr. Recio's likely joining in co-defendant counsels' reply, regarding which there is an outstanding request for a filing deadline of March 12, 2024. D.E. 221. Undersigned counsel does not expect to receive co-defendant's reply until it is actually filed and will need time to ascertain what matters are appropriate to join in and what additional matters will need to be briefed by Mr. Recio. Undersigned counsel will be preparing for oral argument before the Fourth Circuit in *Sutherland v. United States*, Case No. 21-7566, the week of March 12, 2024, and traveling the following week for the oral argument scheduled for March 19, 2024. Accordingly, undersigned counsel will be unavailable to prepare the reply until the week of March 25, 2024, thus necessitating a deadline of April 2, 2024, to file the reply. The government advised that it does not oppose the request for an extension herein but desires the same deadline for both defendants.

Dated: March 4, 2024
New York, New York

Respectfully submitted,

/Amber Donner

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Granted.
So ordered.
3/5/2024



J. PAUL OETKEN
United States District Judge